

## 2 NON-TECHNICAL SUMMARY

This Environmental Impact Assessment report (EIAR) has been prepared to support the proposed planning application for residential development and associated infrastructure on lands in the Kellystown Local Area Plan within the townlands of Kellystown, Clonsilla, Dublin 15.

The EU Environmental Impact Assessment (EIA) Directive (Directive 2011/92/EU, as amended by Directive 2014/52/EU) requires the production of a Non-Technical Summary as part of the production of an EIAR. The Non-Technical Summary ensures that the public is made aware of the environmental implications of any decisions on new developments to take place. The Non-Technical Summary is laid out in a similar, but summarised format to the main EIAR, describing the project, existing environment, impacts and mitigation measures.

Assessments have been conducted in an integrated, collaborative and analytical process in accordance with relevant guidelines on the environmental topics to be examined. They seek to identify the potential for significant adverse environmental impacts arising from the proposed project. Where significant adverse environmental impacts have been identified as potentially occurring during the construction and operational phases of the development, specified ameliorative, remedial or reductive measures are identified.

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### 2.1 Purpose of the EIAR

The objective of this EIAR is to identify, describe and assess the likely environmental impacts of the proposed development as well as to identify the means by and extent to which they can be reduced or ameliorated, to interpret and communicate information about the likely impacts; and to provide an input into the decision-making and planning process.

### 2.2 A Note on Quotations

Environmental Impact Assessment Reports by their nature contain statements about the proposed development, some of which are positive and some less positive. Selective quotation or quotations out of context can give a misleading impression of the findings of the study.

Therefore, the study team urge that quotations should, where reasonably possible, be taken from the overall conclusions of specialists' section or from the non-technical summary, and not selectively from the body of the individual chapters.

### 2.3 The Requirement for an EIAR

The process to determine whether an EIA is required for a proposed development is called Screening. This is dependent on the type of the proposed development, mandatory legislative threshold requirements, and the significance or environmental sensitivity of the receiving environment.

The EIA Directive requires an EIA to be conducted in respect of all development projects listed in Annex I of the Directive. In Irish law, the equivalent of Annex I to the EIA Directive is Schedule 5 (Part 1) of the Planning and Development Regulations 2001 (as amended). Annex II of the EIA Directive allows EU Member States discretion in determining the need for an EIA for the classes of project prescribed, having regard to the overriding consideration that projects of the types listed that are likely to have significant effects on the environment should be subject to EIA.

Schedule 5 (Part 2) of the Planning & Development Regulations 2001 – 2018 set mandatory thresholds for each project class. Sub-section 10(b)(iii) and (iv) addresses 'Infrastructure Projects' and requires that the following class of project be subject to EIA: (b)(i) **Construction of more than 500 dwelling units**. Category 10(b)(iv) refers to 'Urban development which would involve an area greater than 2

hectares in the case of business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.'

The proposed developments will provide a total of 401no. dwellings. When combined with development permitted under ABP-312318-21, as amended by LRD0034/S3 (374no. units), a total number of 775no. dwellings will be provided within the Eastern Development Area of the Kellystown Local Area Plan. The combined development is in excess of 500no. units, creating the need for this overarching EIAR to accompany the planning application for this proposed development (i.e. the project).

## 2.4 Luttrellstown Gate Phase 2 (Plot 1)

Castlethorn Developments Luttrellstown Limited intends to apply for Permission for a development at a site (c. 3.72ha) at lands in the Townland of Kellystown.

The proposed development comprises 99no. residential units in a mix of houses and duplex units consisting of 71no. 2 storey houses (66no. 3-bedroom and 5no. 4-bedroom), 16no. 3 storey houses (16no. 4-bedroom), 4no. 1-bedroom duplex units and 8no. 2-bedroom duplex units and all associated and ancillary site development and infrastructural works, hard and soft landscaping and boundary treatment works, including public open space; public lighting; surface car parking spaces; bicycle parking spaces/stores for mid-terrace units; bin stores. The proposed development includes a minor amendment to development permitted under Reg. Ref. ABP-312318-21, as amended by Reg. Ref. LRD0034-S3, with minor adjustment proposed to the permitted surface water attenuation pond. Vehicular access to the proposed development is provided by the road network permitted under Reg. Ref. ABP-312318-21, as amended by Reg. Ref. LRD0034-S3.

## 2.5 St Mochta's LRD (Plot 2)

Castlethorn Developments Luttrellstown Limited intends to apply for Permission for a development at a site (c. 4.38ha) at lands in the Townland of Porterstown.

The proposed development comprises 302no. residential units in a mix of houses, duplex and apartment units consisting of 62no. 2 storey, 3-bedroom houses and 35no. 3 storey, 4-bedroom houses; 205no. Duplex / Apartment Units (98no. 1-bed, 88no. 2-bed and 19no. 3-bed) across 4no. blocks comprising: Block D ranging in height from 5-7 storeys accommodating 57no. apartment units; Block E ranging in height from 5-7 storeys accommodating 77no. apartment units; Block F ranging in height from 4-5 storeys accommodating 39no. apartment and duplex units; Duplex Blocks G1, G2, G3 & G4 3 storeys in height accommodating 32no. apartment units; and all associated and ancillary site development and infrastructural works, hard and soft landscaping and boundary treatment works, including public open space; public lighting; surface car parking spaces; bicycle parking spaces/stores for mid-terrace units; bin stores. Vehicular access to the proposed development is provided by the road network permitted under Reg. Ref. ABP-312318-21, as amended by Reg. Ref. LRD0034-S3.

## 2.6 Population & Human Health (Chapter 5)

This assessment considers the effect of the Proposed Development on population and human health. In order to assess the baseline environment, the study area chosen was the Catleknock-Knockmaroon and Lucan North Electoral Divisions. An assessment of the existing population of the study area was carried out using data from the Central Statistics Office 2022 Census.

This section of the Environmental Impact Assessment Report (EIAR) assesses the potential effects of the Proposed Development at Kellystown on population and human health. The assessment considers both the construction and operational phases of the development and is based on data from the 2022 Census and other relevant sources.

### Construction Phase

Through construction activities approximately 100-120 construction jobs will be created. This will increase the number of people working in the study area and some employees may move to the study area to be closer to their place of work. The construction phase will also have likely negative effects in the form of air quality, dust, noise production, risk of contamination of water sources and increased number of construction-related vehicles utilising the road network. Through standard good practice, control measures and mitigation measures identified in the relevant technical chapters, the effects of these disturbances will be imperceptible.

### Operational Phase

The Proposed Development will deliver residential units in the area, catering to a diverse population including families, older persons, and young couples. This will have a long-term, positive impact on the local population by supporting housing demand and contributing to community growth.

While increased traffic may lead to minor increases in noise and air pollution, these effects are predicted to be imperceptible due to mitigation measures. No significant adverse impacts on human health are anticipated.

### Mitigation and Monitoring

Although there are no specific mitigation or monitoring measures relating to population and human health, measures detailed in other technical chapters relating to air quality, noise, water quality and traffic will also work towards ensuring the effects on human health are minimised as far as possible.

### Residual Effects

Based on the fact there are no specific mitigation measures proposed for population and human health, the residual impacts will be the same as those detailed in the chapter.

Overall, there will be no significant adverse impacts on, or associated with population and human health attributed to the Proposed Development.

## 2.7 Biodiversity (Chapter 6)

This chapter assesses the potential effects of the Proposed Development on habitats and species; particularly those protected by national and international legislation or considered to be of particular nature conservation importance on or adjacent to the Site. This Report will describe the ecology of the Site, with emphasis on habitats, flora and fauna, and will assess the potential effects of the Construction and Operational Phases of the Proposed Development on these ecological receptors. The Report follows Guidelines for Ecological Impact Assessment in the UK and Ireland, by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2018).

Field surveys have been conducted at Plot 1 and Plot 2 of the Site of the Proposed Development to inform this Biodiversity Chapter, including a habitat and floral survey, bird scoping survey, a non-volant mammal survey, and preliminary bat roost assessment of existing features such as trees at the Site. It is proposed to conduct additional bat surveys.

Royal Canal pNHA was assessed as having National importance. Hedgerows, bat assemblage, bird assemblage, small mammals (excluding bats), and common lizard were assessed as having local importance. Invasive species were assessed as having Less than Local assemblage.

Both plots of the Proposed Development are adjacent to the boundary of Royal Canal pNHA. While hydrogeological pathways for Plot 1 and Plot 2 to this pNHA have been identified, impacts via this pathway have been ruled out due to the embedded mitigations for the Construction Phase of the Proposed Project

Overall, Plots 1 and 2 have been evaluated as of Local Importance having regard for the conservation evaluation scheme (NRA 2009) as Sites “containing areas of hedgerow habitat and woodland habitat (only in the case of Plot 2) that are of local importance to wildlife”

Potential impacts arising from the Construction and/or Operational Phase of the Proposed Development, in the absence of mitigation, can be summarised as follows:

- Water quality impacts in designated sites arising from surface water run-off and potential groundwater flows during the Construction and Operational Phase.
- Dust emissions from the Proposed Development Site.
- Spread of invasive alien flora during the construction phase.
- Loss of hedgerows and woodland habitats.
- Disturbance and/or mortality of fauna within the Site during the Construction Phase and Operational Phase, especially during vegetation clearance prior to the Construction Phase.
- Disturbance to bats within the Site and potential loss of foraging and/or commuting habitat during the Construction Phase and Operational Phase.
- Disturbance and/or mortality of birds within the Site, temporary loss of potential nesting habitat during the Construction Phase.

Potential impacts of the Proposed Development were predicted to range from neutral to significant at the local scale only and can be readily addressed with the mitigation measures proposed.

Provided all mitigation measures are implemented in full and remain effective throughout the lifetime of the Development, no significant residual negative impacts on the local ecology or on any designated nature conservation sites are expected from the Proposed Development.

## 2.8 Land, Soils and Geology (Chapter 7)

An assessment of the potential impact on the existing land, soil and geological environment was carried out by Enviroguide Consulting for the Proposed Development.

The assessment was carried out taking cognisance of appropriate national guidelines and standards for Environmental Impact Assessment using data collected from a detailed desk study, the results of the ground investigations (refer to Appendix 7.1 and 7.2), a site walkover survey and review of all relevant drawings and documents pertaining to the Proposed Development and site. The results of the assessment provided information on the baseline conditions at the site. A detailed assessment of the potential impacts was undertaken, and appropriate avoidance and mitigation measures were identified to reduce any identified potential impact associated with the Proposed Development.

The Proposed Development comprises two (2No.) plots (i.e., Plot 1 (Luttrellstown Gate Phase 2) and Plot 2 (St Mochtas LRD)) which form part of a larger landholding in the townlands of Kellystown, Porterstown and Diswellstown, Clonsilla, Dublin 15, which has been subject to a number of recent planning permissions.

Plot 1 (Luttrellstown Gate Phase 2) is located to the south of Clonsilla Town, adjacent to the west of Carpenterstown and to the southwest of Blanchardstown. It is accessible through the R121 (regional road). The Plot 1 (Luttrellstown Gate Phase 2) site comprises a field of undeveloped grasslands with no evidence of previous structures or development

Plot 2 (St Mochtas LRD) is located to the south of Clonsilla Town, adjacent to the west of Carpenterstown and to the southwest of Blanchardstown. It is accessible through the R121 (regional road). The majority of the Plot 2 (St Mochtas LRD) site comprises a football pitch (St. Mochtas FC) and associated infrastructure including two (2No.) astro turf pitches, hardstanding area for parking and a small clubhouse and shed. While the southern portion of the site comprises undeveloped grasslands.

The Proposed Development will require a land take of approximately 3.72 hectares (ha) for Plot 1 (Luttrellstown Gate Phase 2) and 4.38ha for Plot 2 (St Mochtas LRD). The land use will change from undeveloped grasslands at Plot 1 (Luttrellstown Gate Phase 2) and amenity /community use at for Plot 2 (St Mochtas LRD) to residential land use. The change in land use is in accordance with the zoning objectives as set out in the current Fingal County Development Plan 2023 – 2029 (FCC, 2023).

The construction stage of the Proposed Development will include the excavation of soil and subsoil for the construction of building foundations, drainage and other infrastructure. Where possible, it is intended to reuse all suitable excavated topsoil and subsoil to achieve formation levels and for landscaping and engineering use. However, it is anticipated that surplus excavated soil and subsoil will require removal offsite in accordance with all statutory legislation. It is anticipated that there will be no requirement for the excavation of bedrock during the construction stage of the Proposed Development.

The construction stage of the Proposed Development will also require the importation of aggregates for the construction of the Proposed Development (e.g., construction of the piling mat and granular material beneath road pavement, under floor slabs and for drainage and utility bedding / surrounds). Contract and procurement procedures will ensure that the importation of aggregates to the Proposed Development is sourced from reputable authorised suppliers operating in a sustainable manner and in accordance with the necessary statutory consents.

During the construction stage, all works will be undertaken in accordance with the Construction Environmental Management Plan (CEMP) (Enviroguide Consulting, 2025a) and Resource and Waste Management Plan (RWMP) (Enviroguide Consulting, 2025b) submitted with the planning application under separate cover. Following appointment, the contractor will be required to further develop the CEMP and RWMP to provide detailed construction phasing and methods to manage and prevent any potential emissions to ground with regard to the relevant industry standards (e.g., Guidance for Consultants and Contractors, CIRIA-C532', CIRIA, 2001). The CEMP and RWMP will be implemented for the duration of the construction stage, covering construction and waste management activities that will take place during the construction stage of the Proposed Development. Mitigation works will be adopted as part of the construction works for the Proposed Development. The measures will address the main activities of potential impact which include:

- Control and Management of Earthworks.
- Control and Management of Soils, Subsoils and Stockpiles.
- Management and Control Procedures for the Exportation of Surplus Soils and Subsoils.
- Management and Control Procedures for the Importation of Aggregates and Materials.
- Control and Handling of Cementitious Materials.
- Control and Handling of Fuel and Hazardous Materials.
- Accidental Release of Contaminants.

The operational stage of the Proposed Development consists of the typical activities in a residential development and with the exception of localised gardening works by the appointed management company, there will be no bulk excavation of soils or bedrock or infilling of waste.

During the operational stage of the Proposed Development there is no likely potential for any direct adverse impact on the receiving land, soil and geological environment at the site taking account of the design for the Proposed Development

Overall, there will be no significant adverse impacts on, or associated with the land, soils and geology attributed to the construction stage and operational stage of the Proposed Development.

The excavation of soils impacted with low levels of anthropogenic contamination (i.e., PAH's and petroleum hydrocarbons) and permanent removal off-site will have an overall positive impact on the quality of shallow soils underlying the site.

## 2.9 Water (Chapter 8)

An assessment of the potential impacts on the existing hydrological and hydrological environmental conditions was carried out by Enviroguide Consulting for the Proposed Development.

The assessment was carried out taking cognisance of appropriate national guidelines and standards for Environmental Impact Assessment using data collected from a detailed desk study, the results of the ground investigations, a site walkover survey and review of all relevant drawings and documents pertaining to the Proposed Development and site. The results of the assessment provided information on the baseline conditions at the site. A detailed assessment of the potential impacts was undertaken,

and appropriate avoidance and mitigation measures were identified to reduce any identified potential impact associated with the Proposed Development.

The Proposed Development comprises two (2No.) plots (i.e., Plot 1 (Luttrellstown Gate Phase 2) and Plot 2 (St. Mochta's LRD) which form part of a larger landholding in the townlands of Kellystown, Porterstown and Diswellstown, Clonsilla, Dublin 15, which has been subject to a number of recent planning permissions.

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The site of the Proposed Development (i.e., Plot 1 (Luttrellstown Gate Phase 2) and Plot 2 (St Mochtas LRD)) lies within the Liffey and Dublin Bay Catchment (Hydrometric Area 09) and River Liffey sub-catchment (WFD Name: Liffey\_SC\_100, ID: 09\_15) (EPA, 2025). The site has been mapped by the EPA (EPA, 2025) to be within the Liffey\_180 WFD River Sub Basin (EU Code: IE\_EA\_09L012350).

The bedrock aquifer beneath the site of the Proposed Development (i.e., Plot 1 (Luttrellstown Gate Phase 2) and Plot 2 (St Mochtas LRD)) is within the Dublin GWB (Groundwater Body) (EU Code: IE\_EA\_G\_008).

Locally, groundwater flow direction in the vicinity of the site is likely to be to the south / southeast towards the River Liffey and Liffey Estuary Upper, located south and southeast of the Site respectively, but may vary locally based on topography.

During the construction stage, all works will be undertaken in accordance with the Construction Environmental Management Plan (CEMP) (Enviroguide Consulting, 2025). Following appointment, the contractor will be required to further develop the CEMP to provide detailed construction phasing and methods to manage and prevent any potential emissions to ground with regard to the relevant industry standards (e.g., Guidance for Consultants and Contractors, CIRIA-C532', CIRIA, 2001). The CEMP will be implemented for the duration of the construction stage, covering construction and waste management activities that will take place during the construction stage of the Proposed Development. Mitigation works will be adopted as part of the construction works for the Proposed Development. These measures will address the main activities of potential impact which include:

- Control and Management of surface water runoff.
- Control and management of shallow groundwater during excavation and dewatering (if required).
- Management and control of soil and materials.
- Appropriate fuel and chemical handling, transport and storage.
- Management of accidental release of contaminants at the site.

As documented in the Engineering Assessment Reports for Plot 1 (Luttrellstown Gate Phase 2) and Plot 2 (St Mochtas LRD) (WM, 2025a and WM2025c respectively; submitted with the planning application under separate cover), surface water runoff from impermeable surfaces (including roadways, roofs, and parking areas) will be managed in accordance with the principles and objectives of Sustainable Drainage Systems (SuDS) and the Greater Dublin Strategic Drainage Study (GSDSDS) to treat and attenuate surface water prior to discharging to the permitted network currently under construction for the adjacent SHD (ABP-312318-21). Treated and attenuated surface water from the Proposed Development will discharge to the Rusk River and ultimately the River Liffey. Ongoing regular operational monitoring and maintenance of drainage and the SuDS measures will be incorporated into the overall management strategy for the Proposed Development. This will ensure that there are no impacts on water quality and quantity (flow regime) during the Operational stage of the Proposed Development

Foul water from the Proposed Development (i.e., Plot 1 (Luttrellstown Gate Phase 2) and Plot 2 (St Mochtas LRD)) will discharge to foul drainage network for the permitted SHD (ABP-312318-21) which has been designed to cater for the Proposed Development (WM, 2025a and WM2025c respectively; submitted with the planning application under separate cover). Foul water from the Proposed Development will be treated in the Ringsend Wastewater Treatment Plant (WWTP) (License Reg No: D0034-01) before ultimately discharging to the Liffey Estuary Lower transitional waterbody (EU Code: IE\_EA\_090\_0300). The CoF from UE for Plot 1 (Luttrellstown Gate Phase 2) and Plot 2 (St Mochtas LRD) (Reference Number: CDS24010476 and CDS24010409 respectively) confirmed that the wastewater connections were feasible without infrastructure upgrades.

As outlined in the Engineering Assessment Report (WM, 2025a and WM, 2025c), water supply to the Proposed Development will be provided via a new 150mm diameter connection to the existing 150mm diameter water supply mains for the adjacent SHD (ABP-312318-21) and Block A (Reg. Ref. LRD0034/S3). The CoF from UE for Plot 1 (Luttrellstown Gate Phase 2) and Plot 2 (St Mochtas LRD) (Reference Number: CDS24010476 and CDS24010409 respectively) stated that the connections are feasible without infrastructure upgrade by UE.

Overall, there will be no significant adverse residual impacts on the receiving hydrological and hydrogeological environment associated with the construction stage and operational stage of the Proposed Development. There will be no impact to the existing WFD status of water bodies associated with the Proposed Development including the Liffey\_180, the Liffey\_190, the Liffey Estuary Upper, the Liffey Estuary Lower, the Tolka Estuary, Dublin Bay and the Dublin GWB as a result of the Proposed Development taking account of embedded design avoidance and mitigation measures.

## 2.10 Climate (Air Quality) (Chapter 9)

This chapter describes and assesses the potential impacts on air quality associated with the Proposed Development.

### Construction Phase

A construction phase dust assessment has been carried out in accordance with the Institute of Air Quality Management (IAQM) *Guidance on the Assessment of Dust from Demolition and Construction* (2024). The risk of dust impacts has been assessed separately for demolition, earthworks, construction and trackout for Plot 1 and Plot 2 and the dust emission magnitude has been classified for each of the four activities (this is known as 'Step 2A' of the dust assessment), using the definitions outlined for each activity within the Institute of Air Quality Management (IAQM) guidance. The dust emission magnitude is based on the scale of the anticipated works and is classified as small, medium and large. The sensitivity of the area was determined for dust soiling and human health impacts, respectively, as per the guidance (this is known as 'Step 2B' of the dust assessment). In accordance with the Institute of Air Quality Management (IAQM) guidance, the dust emission magnitude (Step 2A) and sensitivity of the area (Step 2B) have been combined and the risk of impacts from demolition, construction, earthworks and trackout have determined (before mitigation is applied) (this is known as 'Step 2C' of the dust assessment). This risk has then been used to inform the selection of appropriate mitigation measures.

Table 2.1 details the risk of dust impacts for earthworks, construction and trackout activities without mitigation measures for Plot 1.

**Table 2.1: Summary of Unmitigated Risks Plot 1**

Potential Impact	Sensitivity	Magnitude		
		Earthworks	Construction	Trackout
		Medium	Medium	Large
Dust Soiling Impacts	High	Medium Risk	Medium Risk	High Risk
Human Health Impacts	Low	Low Risk	Low Risk	Low Risk
Ecological Impacts	Not applicable – no ecological receptors within study area			

Table 2.2 details the risk of dust impacts for demolition, earthworks, construction and trackout activities without mitigation measures for Plot 2.

**Table 2.2: Summary of Unmitigated Risks Plot 2**

Potential Impact	Sensitivity	Magnitude			
		Demolition	Earthworks	Construction	Trackout
		Small	Medium	Large	Large
Dust Soiling Impacts	High	Medium Risk	Medium Risk	High Risk	High Risk
Human Health Impacts	Low	Negligible	Low Risk	Low Risk	Low Risk
Ecological Impacts	Not applicable – no ecological receptors within study area.				

The dust risk categories detailed in Tables 2.1 and 2.2 above are used to define the appropriate, site-specific, mitigation measures to be adopted.

The Institute of Air Quality Management (IAQM) recommends that significance is only assigned to effect after considering the construction activity mitigation. The risk of dust impacts has been determined in Step 2C and the appropriate dust mitigation measures identified, and the final step is to determine whether there are significant effects arising from the construction phase of the Proposed Development. The proposed mitigation measures will reduce the effects to be not significant.

*Assessment of Specified Infrastructure Projects – PE-ENV-01106* (TII, 2022), states that road links meeting one or more of the following criteria can be defined as being ‘affected’ by a proposed development and should be included in the local air quality assessment. While the guidance is specific to infrastructure projects the approach can be applied to any development that causes a change in traffic.

- Annual average daily traffic (AADT) changes by 1,000 or more;
- Heavy duty vehicle (HDV) AADT changes by 200 or more;
- Daily average speed change by 10 kph or more;
- Peak hour speed change by 20 kph or more; or
- A change in road alignment by 5m or greater.

The construction stage traffic will not change by more 1,000 AADT or 200 HDV AADT and does not meet the above scoping criteria. As a result, a detailed air assessment of construction stage traffic

emissions has been scoped out from any further assessment as there is no potential for significant impacts to air quality.

It can be determined that the construction stage traffic will have a direct, short-term, negative and imperceptible effect on air quality, which is overall not significant in EIA terms.

### Operational Phase

Operational Phase traffic associated with the proposed development has the potential to affect local air quality due to increased vehicle movements. The TII scoping criteria were used to identify affected road links, resulting in a detailed air quality modelling assessment for four road links where traffic is expected to increase by more than 1,000 AADT.

The impact on air quality due to changes in traffic was assessed at sensitive receptors near these roads. Modelling was conducted for NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> concentrations for the Opening, and Design Years under both Do Nothing and Do Something scenarios using the TII Road Emissions Model (REM) online calculator tool.

Inputs for the REM tool included receptor locations, annual average daily traffic movements for light and heavy-duty vehicles, traffic speeds, road link lengths, road type, project county location, and pollutant background concentrations. The Default fleet mix and Intermediate Case fleet data were selected, assuming a balance between current vehicle ownership trends and the adoption of low emission vehicles.

The model predicted road traffic contributions to ambient ground level concentrations at sensitive receptors using generic meteorological data. It incorporated county-based Irish fleet composition, European emission standards, and emission factors for PM<sub>10</sub> from brake and tire wear. Predicted road contributions were added to existing background concentrations to determine ambient concentrations, which were then compared with relevant air quality standards to assess compliance.

Overall, the TII significance criteria have identified neutral impacts due to increases in NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> annual mean concentrations which are less than 5% of the annual mean ambient air quality standards (and the annual mean concentrations are less than 75% of the air quality standard). This equates to a potential effect of the proposed development on ambient air quality, and human health, in the operational stage according to the EPA guidelines (EPA, 2022) which is considered direct, long-term, negative and not significant.

### Cumulative

In terms of dust, no significant impacts are predicted; good construction practice, which incorporates the implementation of the identified mitigation measures, will be employed at the site. Due to the implementation of good construction practices at the site and these offsite permitted developments, it is not anticipated that significant cumulative impacts will occur.

Assessment of road traffic emission impacts on air quality involved traffic data which is inclusive of traffic associated with other existing and permitted developments on the road networks surrounding the site. Therefore, cumulative impacts have been assessed in this regard and the impact on ambient air quality has been determined as not being significant.

It is considered that there are no other potential significant cumulative impacts associated with the proposed development and considered offsite permitted developments.

### Residual Impact

The proposed mitigation measures will ensure that a potential significant adverse dust effect will not occur, therefore, the residual effect will not be significant.

The traffic generated by the proposed development has been assessed for its impact on air quality and it has been determined to have an overall not significant impact in terms of local air quality with the implementation of the proposed mitigation measures.

## 2.11 Climate (Climate Change) (Chapter 10)

AWN Consulting Limited has been commissioned to conduct an assessment of the likely impact on climate associated with the proposed residential development comprising Luttrellstown Gate Phase 2 (Plot 1) and St Mochta's LRD (Plot 2) located in the townlands of Kellystown and Porterstown respectively, in Clonsilla, Dublin 15.

### Baseline Environment

The existing climate baseline can be determined by reference to data from the EPA on Ireland's total greenhouse gas (GHG) emissions and compliance with European Union's Effort Sharing Decision "EU 2020 Strategy" (Decision 406/2009/EC). The EPA state that Ireland had total GHG emissions of 60.6 Mt CO<sub>2</sub>e in 2023. This is 2.27 Mt CO<sub>2</sub>e higher than Ireland's annual target for emissions in 2023. EPA projections indicate that Ireland has used 63.9% of the 295 Mt CO<sub>2</sub>e Carbon Budget for the five-year period 2021-2025. Further reduction measures are required in order to stay within the budget requirements.

### Potential Impact of the Proposed Development

The potential impacts on climate have been assessed in two distinct ways – a greenhouse gas assessment (GHGA) and a climate change risk assessment (CCRA). The GHGA quantifies the GHG emissions from a project over its lifetime and compares these emissions to relevant carbon budgets, targets and policy to contextualise magnitude. The CCRA considers a projects vulnerability to climate change and identifies adaptation measures to increase project resilience.

#### Greenhouse Gas Assessment

GHG emissions associated with the proposed development are predicted to be a small fraction of the relevant sectoral 2030 emissions ceilings. The proposed development will incorporate some mitigation measures which will aim to reduce climate impacts during construction and once the development is operational. At a minimum these include the Nearly Zero Energy Building (NZEB) compliance and targeting a Building Energy Ratio (BER) in line with the NZEB requirements.

GHG emissions during the operational phase due to road traffic were assessed. The changes in traffic volumes associated with the operational phase of the development were substantial enough to the meet the assessment criteria requiring a detailed climate modelling assessment, as per Transport Infrastructure Ireland (TII) 2022 guidance "PE-ENV-01104: Climate Guidance for National Roads, Light Rail and Rural Cycleways (Offline & Greenways) – Overarching Technical Document". There will be a slight increase in the traffic on the local road network which will result in some minor increases in CO<sub>2</sub> emissions. These have been assessed as a negligible fraction of Ireland's transport sector 2030 emissions ceiling.

A number of sustainability measures have been incorporated into the design of the development to ensure impacts to climate are reduced.

#### Climate Change Risk Assessment

A CCRA was conducted to consider the vulnerability of the proposed development to climate change, as per the TII 2022 PE-ENV-01104 guidance. This involves an analysis of the sensitivity and exposure of the development to future climate hazards which together provide a measure of vulnerability. The hazards assessed included flooding (coastal, pluvial, fluvial); extreme heat; extreme cold; drought; extreme wind; lightning; hail; fog; wildfire and landslides. The proposed development is predicted to have at most low vulnerabilities to the various climate hazards and therefore climate change risk is not considered significant.

Overall, no significant impacts to climate are predicted during the construction or operational phases of the proposed development.

### **Mitigation and Residual Effects (Post-Mitigation)**

A number of best practice mitigation measures are proposed for the construction phase of the proposed development to ensure that impacts to climate are minimised. Design mitigation has been considered when assessing the vulnerability of the development to future climate change.

The impact to climate as a result of a proposed development must be assessed as a whole for all phases. The proposed development will result in some impacts to climate through the release of GHGs. TII reference the IEMA guidance which states that the crux of assessing significance is “not whether a project emits GHG emissions, nor even the magnitude of GHG emissions alone, but whether it contributes to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050”. The proposed development has been designed to reduce the impact on climate where possible during operation. The proposed development has incorporated some mitigation measures to reduce climate change impacts. Once mitigation measures are put in place, the effect of the proposed development in relation to GHG emissions is considered direct, long-term, negative and slight which is not significant in EIA terms.

In relation to climate change vulnerability, it has been assessed that there are no significant risks to the proposed development as a result of climate change.

### **Cumulative Impact of the Proposed Development**

With respect to the requirement for a cumulative assessment PE-ENV-01104 states that “the identified receptor for the GHG Assessment is the global climate and impacts on the receptor from a project are not geographically constrained, the normal approach for cumulative assessment in EIA is not considered applicable. By presenting the GHG impact of a project in the context of its alignment to Ireland’s trajectory of net zero and any sectoral carbon budgets, this assessment will demonstrate the potential for the project to affect Ireland’s ability to meet its national carbon reduction target. This assessment approach is considered to be inherently cumulative”.

As a result, the cumulative impact of the proposed development in relation to GHG emissions is considered direct, long-term, negative and slight, which is overall not significant in EIA terms.

## **2.12 Climate (Sunlight and Daylight) (Chapter 11)**

Chapter 11 of the EIAR assesses the potential impact to daylight and sunlight access on the neighbouring environment resulting from the proposed developments in the townlands of Kellystown and Porterstown, and was completed by Barry Murphy of Model Works.

### **Plot 1 (Luttrellstown Gate Phase 2)**

The proposed development comprises 99no. residential units in a mix of houses and duplex units. The main Dublin-Maynooth-Sligo rail line and Royal Canal bound the site to the north and the area to the west is existing farmland. The area to the east and south has received planning permission for a residential scheme and is currently under construction. There is a green band of open space and retained hedgerow between the scheme under construction and the proposed development which provides circa 30m-40m between the

dwelling of the schemes. Given the distance the proposed buildings are from existing or under construction dwellings, it was found that the impact to daylight or sunlight on these neighbouring buildings would be imperceptible.

### **Plot 2 (St. Mochta’s LRD)**

The proposed development comprises 302no. residential units in a mix of houses, duplex and apartment units. The proposed site is located predominantly on the former sports ground of St. Mochta's FC in the townland of Porterstown. The main Dublin-Maynooth-Sligo rail line and Royal Canal bound the site to the north. Diswellstown Road and Porterstown Road form the boundaries of the site to the east and west respectively. The area to the west and south has received planning permission for a residential scheme and is currently under construction.

Due to the rural nature of the site and its distance from existing buildings, only the traveller accommodation site to the west and block A of the scheme currently under construction to the south required a detailed assessment for potential impact. This assessment demonstrated that, at most, there was only a slight impact to both daylight and sunlight for these dwellings.

## 2.13 Air, Noise and Vibration Chapter 12)

Chapter 12: Noise and Vibration focuses on assessing the potential impacts and significant effects of noise and vibration associated with the construction and operation of both Plot 1 (Luttrellstown Gate Phase 2) and Plot 2 (St. Mochta's LRD) . It aims to provide a comprehensive understanding of the existing noise environment, the methodology used for the assessment, the potential effects of noise and vibration, and the proposed mitigation measures to minimise any adverse impacts from the overall proposed development.

### Baseline Conditions

The baseline environment relevant to the noise impact assessment includes existing noise sources and receptors within the study area. These elements are key in informing the noise impact assessment scope and methodology.

A baseline noise survey was carried out across the development site from 26th February 2025 to 5th March 2025 and established that the dominant existing noise source within the study area is road traffic noise.

Results and analysis of the baseline noise survey, in conjunction with the baseline traffic flow information serve as a reference point for evaluating the potential impacts of the overall Proposed Development.

### Assessment of Construction Effects

The construction phases of both Plot 1 (Luttrellstown Gate Phase 2) and Plot 2 (St. Mochta's LRD) will inevitably introduce noise into the environment. However, recommended mitigation measures outlined in Section 12.9 of Chapter 12 Air (Noise & Vibration) will ensure that construction noise impacts will be imperceptible at nearby Noise Sensitive Locations (NSL's).

Vibration during construction has also been assessed. The worst-case scenario indicates a short-term imperceptible impact at nearby NSL's.

### Operational Noise Assessment

Operational noise associated with the overall Proposed Development (inclusive of Plot 1 and Plot 2 ) will arise primarily from traffic generated by residents and visitors. The assessment of operational noise predicts imperceptible significance, which will have a negligible impact on NSL's.

### Mitigation Measures

To address the identified noise impacts on NSL's during the construction phase of both Plot 1 (Luttrellstown Gate Phase 2) and Plot 2 (St. Mochta's LRD), several mitigation measures are proposed.

These measures include the use of noise barriers, careful scheduling of construction activities to avoid sensitive times, and the selection of quieter machinery and equipment.

The implementation of these measures aims to reduce noise levels during construction, ensuring that the impacts on NSL's are minimised.

### **Residual Effects**

Following the implementation of the proposed mitigation measures, the assessment evaluates the residual effects of noise and vibration. It is concluded that the residual effects of construction noise from both Plot 1 (Luttrellstown Gate Phase 2) and Plot 2 (St. Mochta's LRD) are expected to be temporary and of slight to imperceptible significance, while operational noise from both plots is anticipated to be of imperceptible significance, which will have a negligible impact on NSL's.

### **Conclusion**

In summary, Chapter 12 provides a detailed assessment of noise and vibration impacts associated with the Proposed Development which is inclusive of both Plot 1 (Luttrellstown Gate Phase 2) and Plot 2 (St. Mochta's LRD). The assessment identifies potential effects during both the construction and operational phases. Through the application of established methodologies and the implementation of effective mitigation measures, the project aims to minimise adverse noise and vibration impacts, ensuring that the development is compatible with the surrounding environment and maintains the quality of life for residents.

## **2.14 Landscape and Visual Impact Assessment (Chapter 13)**

### **Non-Technical Summary**

The LVIA Report reviewed the existing landscape with respect to existing designations, views and prospects, landscape character, presence of National Monuments, location with respect to existing adjoining residential development and impacts of the proposed development on the existing landscape setting and features.

### **St Mochta's LRD**

The subject site is located in an area identified for development under the Kellystown Local Area Plan ("the LAP"). The application site is currently in use as football pitches for St. Mochta's Football Club, however, an application from the applicant has recently been lodged comprising of the relocation of St. Mochta's Football Club grounds within the new emergent residential neighbourhood of Kellystown, Dublin 15, in accordance with Key Objective DA 1.1 for the Eastern Development Area of the Kellystown Local Area Plan. The application site measures c. 4.08ha and is generally bounded by Diswellstown Road/ Dr. Troy Bridge to the east, the Royal Canal and the Dublin-Maynooth Railway Line to the north, development consented under An Bord Pleanála Reg. Ref. ABP-312318-21 as amended by Reg. Ref. LRD0034-S3 to the south and residential zoned lands within the Eastern Development Area (DA1) of the Kellystown Local Area Plan.

### **Luttrellstown Gate Phase 2**

The subject site is located in the Kellystown LAP, north-west of Block A (which is currently under construction under Reg. Ref. LRD0034/S3) and north of the new Kellystown Link Road under construction as part of the adjacent residential development (ABP-312318-21), west of Porterstown Road, and north of Luttrellstown Road.

The overall site forms part of a wider area subject to the Kellystown Local Area Plan objective of the County Development Plan, for a planned new residential neighborhood. The Kellystown LAP 2021 was adopted in January 2021. The proposed development lies within 'Development Area 1' for early phase development at the eastern end of the LAP lands.

The landscape character of the site is largely determined by the following:

Kellystown is located approximately 1.5 km south-west of Blanchardstown Town Centre, 1.8 km south-west of Blanchardstown Main Street and 9.8 km north-west from O'Connell Street, Dublin. The subject lands are situated directly south of the Royal Canal and the Dublin-Maynooth Railway Line and between Porterstown Road and Diswellstown Road to the east and Clonsilla Road (R121) to the west. Luttrellstown Road, a country thoroughfare, frames the lands to the south.

Along with the football pitches and associated buildings for St Mochta's Football Club, the site's undeveloped character is that of agricultural lands with extensive residential development to the north and east. The large educational and civic office complex with car parking and playing fields to the south of the lands is a prominent visual presence in the area. The Eastern development parcel lands are screened from the Diswellstown Road by screen planting that was carried out as part of the canal railway overbridge development. These lands are open to views from the south along the new Porterstown Road and from the Annefield residential development to the south.

### Summary

The LVIA Report concludes that the development would be in accordance with the various landscape and visual objectives, policies and land use zonings as set out in the Fingal County Development Plan 2023-2029. The visual impact of the proposed development upon completion and when considered within the context of the cumulative surrounding development will have a long-term neutral moderate visual impact.

## 2.15 Material Assets (Transportation) (Chapter 14)

### Introduction

This chapter of the Environmental Impact Assessment Report (EIAR) provides an assessment of the impact of two proposed residential developments within the Kellystown Local Area Plan: Plot 1 (Luttrellstown Gate Phase 2) and Plot 2 (St. Mochta's LRD). In addition, a cumulative impact assessment is carried out as part of the present chapter. The assessment covers current and forecast vehicular behaviour, the public transport network and pedestrian and cycle access, both during the construction phase and over the lifetime of the development.

A full description of the development can be found in Chapter 3: Description of Proposed Development of this EIAR.

This chapter was completed by Waterman Moylan Consulting Engineers.

### Location

The application sites for Luttrellstown Gate Phase 2 (Plot 1) and St Mochta's LRD (Large Scale Residential Development) (Plot 2) form part of a larger landholding in the townlands of Kellystown, Porterstown and Diswellstown, Clonsilla, Dublin 15, which has been subject to a number of recent planning permissions, summarised below.

### Scope

This Transport Assessment is a comprehensive review of all the potential transport impacts of the development including a detailed assessment of the transportation systems provided and the impact of the proposed development on the surrounding environment and transportation network.

### Receiving Environment

The subject sites, located in Kellystown, Clonsilla, Dublin 15, forms part of the Kellystown Development Masterplan which includes an important residential area with some 1,900 no. residential units, a

primary school for c. 600 no. pupils, a secondary school for c. 1,000 no. pupils and a local centre of 2,500sqm. All developed on approx. 65 hectares the lands located in Kellystown lands.

The existing pedestrian infrastructure in the surrounding area comprises a well-connected network of footpaths, linking various neighbourhoods with local amenities such as schools, grocery stores, and public transport facilities. Additionally, a good-quality cycle network is present in the vicinity of the proposed development.

In terms of public transport, the nearest bus stops—located approximately 800 metres from the site—are served by Routes 37 and 70n. Furthermore, two railway stations, Coolmine and Clonsilla, are situated within 1.6 kilometres of the site. Both stations are served by the Western Commuter rail line, providing convenient access to the wider region.

### **Transportation Improvements**

The surrounding area is expected to benefit from several significant public transport improvements in the coming years, including the implementation of the BusConnects scheme and the DART+ West project. These initiatives aim to enhance connectivity, frequency, and reliability of public transport services.

In addition, the development of the Kellystown Development Masterplan will incorporate a network of greenways, cycle paths, and dedicated cycle lanes. These enhancements will contribute to a more accessible, sustainable, and enjoyable active travel environment for residents and visitors alike.

Furthermore, the road network will be improved through the delivery of the Kellystown Link Road, which will enhance accessibility in an east–west direction. Moreover, several junctions will be upgraded to improve vehicular movement, reducing queuing and travel times, while maintaining a focus on prioritising pedestrian and cyclist movements.

### **Description of Proposed Developments**

Both sites—Luttrellstown Gate Phase 2 (Plot 1) and St Mochta’s LRD (Large-Scale Residential Development) (Plot 2)—are proposed with a well-structured road network and pedestrian infrastructure, in accordance with the recommendations of the Design Manual for Urban Roads and Streets (DMURS).

The proposed developments incorporate “home zones” (also known as shared surfaces), designed primarily to prioritise the needs of pedestrians, cyclists, children, and residents, with the objective of reducing vehicle speed and minimising car dominance.

Furthermore, traffic calming measures have been integrated throughout both sites. These include carriageway narrowing within both home zones and segregated roads to encourage lower vehicle speeds, as well as raised tables on segregated roads to provide safer pedestrian crossing points.

All internal roads are designed for low-speed operation, with traffic calming features ensuring the safe functioning of junctions and a secure environment for both pedestrians and cyclists.

The developments also feature a well-connected footpath network, enhancing permeability within the sites and providing direct links to the adjacent Kellystown Development (Phase 1) and the wider surrounding area.

Cycle paths are provided around the sites, ensuring connectivity between internal residential units and the main shared pedestrian/cyclist route along Porterstown Road.

In addition, both developments include adequate provision for car and bicycle parking, in line with local planning guidelines.

### **Timescale**

The developments have the following schedule:

Luttrelstown Gate Phase 2: It is anticipated that construction of the proposed development will commence in Q1 2026 and be completed by the end of 2027. As a result, the opening year is expected to be 2028.

St. Mochta's LRD: It is anticipated that construction of the proposed development will commence in Q3 2026 and be completed in Q2 2029. For the purposes of this report, the opening year is assumed to be 2030.

### **Traffic Impact**

The potential future construction traffic flows for both developments have been evaluated as part of the traffic impact assessment. As results, it is expected that the low number of trips to/from the sites will generate a minimum impact in the surrounding area. These movements can be effectively accommodated within the existing road infrastructure.

For the operational phase, a comprehensive assessment was carried out, incorporating a worst-case scenario that assumes the full build-out and occupancy of the entire Kellystown Development Masterplan. This assessment examined the potential impact of the proposed developments on local junctions, including traffic modelling including the future horizon year, 15 years post-opening.

The results demonstrate that all assessed junctions are expected to operate efficiently and within capacity under both present and future conditions. Consequently, no significant queuing or congestion issues are anticipated on the surrounding road network.

In conclusion, the proposed developments are expected to have a minimal traffic impact during both the construction and operational phases.

### **Mitigation Measures**

Traffic and other movements on the road network during the Construction Stage will be managed under the *Construction Traffic Management Plan* and by carrying out the works in a number of stages to a sequence to be prepared in conjunction with Fingal County Council and implemented by the main Contractor.

During the Operational Stage, transportation movements will be managed by the *Mobility Management Plan* promoting best practise mobility management and travel planning to provide for the necessary mobility via sustainable transport modes.

### **Residual Impact**

The residual impact of the Construction Stage on the transportation environment in the area of the subject site is predicted to be temporary, short-term, slight, and negative.

The residual impact of the Operational Stage on the transportation environment in the area of the subject site is predicted to be permanent, long-term, slight, and positive.

### **Monitoring**

As part of the Construction Management Plan, traffic management and deliveries will be subject to close monitoring during the construction stage. The contractor's mobility management plan will be subject to oversight on the part of the appointed contractor, with a view to ensuring the plan is operating effectively.

During the operational phase, responsibility for monitoring and reviewing the plan will lie with the Mobility Management Plan Coordinator. This individual will be responsible for assessing the effectiveness of the Mobility Management Plan, determining whether the proposed targets are being met, and identifying whether additional measures are required to align with any revised objectives.

## Reinstatement

During the construction phase, the designated coordinator responsible for the implementation of the Construction Mobility Management Plan will conduct regular inspections of the public streets impacted by the development activities to ensure that any disruptions to public mobility are minimized and managed effectively. The coordinator will work closely with the construction team to address any issues that arise, ensuring that the public streets remain as accessible and safe as possible throughout the construction period. The coordinator will propose measure to mitigate any potential negative impacts on the local community and traffic flow. Upon the completion of the construction phase, the appointed contractor will undertake the reinstatement of the affected public streets.

## 2.16 Material Assets (Waste) (Chapter 15)

This chapter provides an assessment of the potential impacts of the Proposed Development on waste management services.

All waste materials generated during the construction and operational phase of the Proposed Development will be managed in accordance with the respective waste management plans.

The waste management objectives for the Proposed Development are as follows, and will facilitate material reuse and recycling, where possible, and seek to divert waste from landfill:

- Prevention: The Principal Contractor will prevent and minimise waste generation where possible by ensuring large surpluses of construction materials are not delivered to the site through coordination with the suppliers, operating a 'just-in-time' delivery scheme and ensuring sub-contractors conform to the Contractor(s) Construction and Environmental Management Plan (CEMP), being an update to the principles set out in the CEMP (Enviroguide, 2025) submitted with this application;
- Reuse: Reusing wastes and surplus materials where feasible and in as many high value uses as possible;
- Recycle: Recycling wastes where possible such as introducing on site crushers to produce waste derived aggregates which, subject to appropriate testing and approvals, may be re-used in the Proposed Development; and
- Disposal: Where disposal of waste is unavoidable, this will be undertaken in accordance with the Waste Management Act 1996, as amended.

### Construction Phase

Enviroguide (2025) has prepared a Resource Waste Management Plan (RWMP) and Construction Environmental Management Plan (CEMP) for the construction phase of the Proposed Development at St Mochtas LRD (Plot 1 and Plot 2). The development involves demolishing a vacant house and agricultural buildings, with an estimated footprint of 256.7 m<sup>2</sup>. The RWMP estimates that 168 kg/m<sup>2</sup> of construction and demolition (C&D) waste will be generated.

Ground clearance and levelling will remove scrap materials, minor vegetation, and debris, with some diversion of services. Surplus building materials, excess concrete, and packaging waste will be generated during construction. Approximately 5000 m<sup>3</sup> of soil will be excavated, with clean inert soil removed under Article 27 By-product notification.

Onsite storage of hazardous wastes will be minimized, with regular offsite removal organized to reduce exposure and environmental impacts. Hazardous wastes will be recovered or appropriately disposed of by a specialist contractor. If previously unidentified hazardous materials are found, a management plan will be implemented.

Material will be segregated on-site for appropriate waste streams and off-site recovery/disposal. Concrete will be removed off-site for recycling. C&D waste will be segregated into dedicated skips, with off-site segregation if needed. Bunded storage containers will be provided for hazardous wastes. Office and canteen waste will be segregated and collected by an authorized waste collector.

Temporary stockpiling of materials will be managed to prevent mixing and environmental issues. Heavily contaminated materials will be handled according to the CEMP. Site personnel will be trained to identify different waste types. Waste from construction workers will be managed and sent for recycling, recovery, or disposal.

The potential impact from the construction phase on waste recovery and disposal is likely to be short-term, negative, direct, and slight in nature.

### **Operational Phase**

An Operational Waste Management Plan (OWMP) has been prepared for the Proposed Development (Plot 1 and Plot 2) to ensure waste management during the operational phase complies with current legal and industry standards. This includes adherence to various acts and regulations such as the Waste Management Act 1996, Protection of the Environment Act 2003, and the National Waste Management Plan for a Circular Economy 2024-2030.

The development will increase municipal waste production, but waste collection is already common in the urban area. Predicted waste types include Mixed Municipal Waste, Dry Mixed Recyclables, Organic Waste, and Glass. Additional waste types like bulky items, WEEE, batteries, textiles, light bulbs, chemicals, and waste oil will be managed separately.

Waste collections must comply with the Waste Contractor's Permit and local bye-laws. A four-bin system will be available from first occupancy. Waste collection vehicles will service bins and return them to Waste Storage Areas, ensuring compliance with the Traffic Management Plan and BS 5906: 2005 standards.

The management company will maintain collection records for apartments and duplexes, while individual residents will manage their own records. The management company will also ensure bins are accessible for collection. Residents must place and return their bins in compliance with local bye-laws.

The OWMP aims to achieve high levels of recycling, reuse, and recovery, aligning with European targets. The design of Waste Storage Areas meets the "Sustainable Urban Housing: Design Standards for New Apartments" (July 2023). The capacity of waste collection companies and facilities in Fingal is planned to accommodate growth, ensuring infrastructure supports waste segregation at source.

The operational phase's impact on municipal waste disposal is expected to be long-term, negative, direct, and slight.

### **Cumulative Impact**

The capacity of waste collection companies and waste management facilities in Fingal have been designed with forward planning and expansion in mind to cater for a growing population. It is necessary that all the developments provide the infrastructure and services to assist residents to segregate domestic waste at source, in order to reduce the generation and disposal of non-recyclable mixed waste. Existing waste collections currently take place in the local area and during the operational phase, the Proposed Development (Plot 1 and Plot 2) will be added to an existing collection route. The likely effect will be neutral and not significant on waste management facilities in the area in the long term.

### **Residual Effects**

The implementation of the waste management plans in conjunction with best environmental practice and appropriate management of the Proposed Development, will ensure that there are no likely significant adverse effects to waste management as a result of the construction and operational phases of the Proposed Development. The residual effects on waste management during the construction phase are considered to be slight, neutral, direct and short-term for the construction phase and neutral, direct and slight in the long-term for the operational phase.

## 2.17 Material Assets (Utilities) (Chapter 16)

### Introduction

This chapter of the Environmental Impact Assessment Report (EIAR) provides an assessment of the impact that the proposed residential development at the Luttrellstown Gate Phase 2 and St. Mochta's LRD lands at Kellystown LAP, Clonsilla, Dublin 15. will have on the material assets, including major utilities within and around the site during the construction and operational phases such as built services (i.e. gas, electricity, telecommunications etc.) in the vicinity of the site. It also sets out mitigation and remedial measures and methods of monitoring while the development is operational.

A full description of the development can be found in Chapter 3: Description of Proposed Development of this EIAR.

This chapter was completed by Waterman Moylan Consulting Engineers.

### Assessment Methodology

This chapter has been prepared in accordance with the requirements of the following statutory documents which were consulted in the course of the study: -

- Environmental Protection Agency (EPA), Guidelines on the Information to be contained in Environmental Impact Assessment Reports (May 2022).
- EPA, Advice Notes on Current Practice (in the preparation of Environmental Impact Statements) (September 2003). Note that an updated advice note, on foot of the May 2022 guidelines, is anticipated soon but has not yet been published.
- EPA, Advice notes for preparing Environmental Impact Statements (September 2015).
- Circular Letter PI 1/2017: Implementation of Directive 2014/52/EU on the effects of certain public and private projects on the environment (EIA Directive).

The study was also informed by numerous site visits, topographical surveying of the application site, the sourcing of utility information/records from the relevant service providers, an analysis of the resources consumed, and an estimation of waste generated by the Proposed Development at both the construction and operational phases.

### Receiving Environment

The lands subject to both proposed residential developments are within the ownership of the applicant, Castlethorn Developments Luttrellstown Unlimited. Vehicular access to the proposed development is proposed off the western extension of Kellystown Link Road via the internal road of the under construction Kellystown Development -Phase 1- (Plg. Apl. Reg. Ref. No. SHDW/004/21).

The Kellystown Link Road is currently a single carriageway that extends for approximately 280 metres from the signalised crossroads with Diswellstown Road & Porterstown Link Road. As outlined in the Kellystown Local Area Plan, the Kellystown Link Road will be extended westwards to the junction of the Clonsilla Road (R121) and Luttrellstown Road.

Both proposed Luttrellstown Gate Phase 2 and St. Mochta's LRD developments have been designed with a well-interconnected footpath network providing permeability through the site, to the adjacent Kellystown Development -Phase 1- and to the surrounding area. There is a cycle path around the subject site connecting the internal residential units with the main shared pedestrian/cyclist path on Porterstown Road. In addition, the development includes sufficient cycling parking spaces, as outlined in local guidelines

There are electricity, gas, and telecommunications utilities available to both sites.

Based on the information received from ESB Networks (ESBN), there are below ground ESB cables that service adjacent properties. There are no supply issues envisaged.

There is an existing Gas network in the vicinity of both sites, with a gas main at the junction of Diswellstown Road and Porterstown Link Road. Additionally, there is a high pressure transmission pipe running through the western end of the St. Mochta's LRD subject site.

Eir currently has an existing network in the vicinity of both sites along Diswellstown Road and to the west of the subject site along Porterstown Road.

### Characteristics of Proposed Development

The application sites for Luttrellstown Gate Phase 2 (Plot 1) and St Mochta's LRD (Large Scale Residential Development) (Plot 2) form part of a larger landholding in the townlands of Kellystown, Porterstown and Diswellstown, Clonsilla, Dublin 15, which has been subject to a number of recent planning permissions, summarised below.

The consented Kellystown SHD scheme ABP-312318-21 was granted (with 27no. conditions) on 2 March 2023, under section 9(4) of the Planning and Development (Housing) and Residential Tenancies Act 2016 for a Strategic Housing Development. The consented scheme includes 346no. dwellings (123no. houses and 3no. apartment buildings accommodating 223no. apartment units)<sup>1</sup>, 1no. childcare facility (c. 528 sq m) and 1no. retail unit (c. 236 sq m), in buildings ranging from 2 to 8-storeys, and associated site works and 2.1ha public park amenity. The overall gross site area of the entire consented scheme amounts to c. 9.73 ha, at land zoned 'RS' residential, in Eastern Development Area 1 and land zoned 'OS' open space to the south of permitted Kellystown Link Road. The site is otherwise generally bounded by the existing Kellystown Link Road and schools to the south; the Old Porterstown Road and existing St Mochta's FC grounds to the east; Dr Troy Bridge/L3036 Porterstown Link Road also to the east; the Dublin Maynooth rail line and Grand Canal to the north and undeveloped (Luttrellstown Gate) lands to the west.

Amendments to the consented SHD scheme ABP-312318-21 was granted on 21 August 2024 under Reg. Ref. LRD0034-S3 for development comprising of the reconfiguration of Block A, located in the eastern corner of the site, to accommodate 193no. dwellings in total (an increase of 28no. dwellings) in buildings ranging between 2 and 8 storeys in height, with the following residential unit mix: 82no. 1-bed apartment units, 108no. 2-bed apartment units, and 3no. 2-bed duplex units. Associated reconfiguration of internal floor plans to accommodate an increase from 31no. to 34no. apartment units per floor. Reduced floor area of the internal residential amenity area (from c.405.7 sq m to c.120.9 sqm). Reduced floor area of the retail unit (from c.236 sq m to c.200.6 sq m). And all associated and ancillary site development, infrastructural, hard and soft landscaping and boundary treatment works.

A live planning application, currently at Further Information Stage under FW25A/0033E seeks the relocation of St. Mochta's Football Club grounds, to 'OS' zoned lands to the south of Kellystown Link Road and north of the Cemetery lands and Luttrellstown Road, within the new emergent residential neighbourhood of Kellystown, Dublin 15. This is in accordance with Key Objective DA 1.1 for the Eastern Development Area of the Kellystown Local Area Plan.

In November 2020, Fingal County Council published proposals for the development of a link road through the Kellystown lands for public consultation, under the Part 8 development process. Note that the consented Kellystown SHD scheme ABP-312318-21 includes the extension of the 'Kellystown Link Road' west from its existing section serving the school campus and cemetery lands. A single new vehicular access point to residential development in the Kellystown Eastern Development Area extends north from the 'Kellystown Link Road', under SHD ABP-312318-21. Upgrade works to the existing segment of the 'Kellystown Link Road' and its junctions with Porterstown Road and Diswellstown Road/Overbridge are also included in the Kellystown SHD permission.

In the wider surrounding area, the following developments are subject of live planning permissions:

- ABP Reg. Ref. 320886-24 (FCC Reg. Ref. LRD0021/S3E) (north of the Dublin-Maynooth Railway Line) issued with a Grant of Permission on 21 January 2025 for the construction of 170 residential units, a café, and a childcare facility, and all associated development works including the demolition of structures, site clearance, and ground levelling.
- ABP Reg. Ref. 315707-23 (FCC Reg. Ref. FW22A/0152) (north of the Dublin-Maynooth Railway Line) issued with a Grant of Permission on 19 December 2023 comprises the construction of a mixed use retail and residential development comprising 1no. food store (2,500sqm GFA), 3 no. retail units (611.8sqm GFA) and 67 no. residential units.<sup>2</sup>

### Potential Impacts

Electricity will be required during the construction phase. In conjunction with the ESB, the provision of a temporary builders' power supply will be provided. There is potential for temporary impacts to the local electricity supply network, by way of disruption in supply to the local area during electricity connection works for the Proposed Development. However, this is a potential impact which is likely to be neutral, slight, and temporary.

The supply of gas will not be operational during the construction phase of the Proposed Development. There is potential for temporary impacts to the local gas supply network, by way of disruption in gas supply to the local area. However, this is a potential impact which is likely to be neutral.

Telecommunications will not be operational during the construction phase of the Proposed Development. There is potential for temporary impacts to local supply, by way of disruption during connections works. However, this is a potential impact which is likely to be neutral, slight, and temporary.

There will be an increase in the demand and usage of electricity in the area once the proposed development is operational. The impact is deemed to be neutral, imperceptible, and long-term effect.

No gas connection is being sought for the site. Therefore, the impact is deemed to be neutral, imperceptible, and no long-term effect.

There will be an increase in the demand for broadband bandwidth in the area once the proposed development is operational. Therefore, the impact is deemed to be neutral, imperceptible, and long-term effect.

### Mitigation Measures (Ameliorative, Remedial or Reductive Measures)

The construction phase mitigation measures include avoidance, reduction and remedy measures as set out within the Development Management Guidelines document. The design and construction of the necessary service infrastructure will be in accordance with relevant codes of practice and guidelines. This is likely to mitigate any potential impacts during the operational phase of the Proposed Development. However, routine maintenance of the site services will be required from time to time. As such, any mitigation measures will be advised by the relevant service provider.

A detailed Construction, Demolition and Waste Management Plan will be developed by the Main Contractor post planning stage.

Operational waste will be managed by a designated management company on site and the appointed licenced waste contractor which will ensure the sustainable management of domestic and commercial waste arising from the development in accordance with legislative requirements and best practice standards.

### Residual Impact

There are no environmental impacts envisaged as part of the proposed works provided all mitigation measures are fully implemented. This should include any mitigation measures proposed in respect of flora and fauna which is dealt with separately in this report.

There will be minor traffic disruption when excavation works are being carried out. Damage could be caused to existing services during excavation.

During the operational stage, there would be a significant load on the local ESB and telecommunications infrastructure. However, it is anticipated that ongoing upgrades to local existing infrastructure, as well as the implementation of new infrastructure should alleviate any adverse impacts on the existing networks.

### Monitoring

Monitoring will be implemented on a site by site basis in line with best practice standards. Prior to the operational phase of the proposed developments, all services / utility connections will be tested by a suitably qualified professional under the supervision of the service provider.

Any monitoring of the built services required during the operational phase of the Proposed Development will be as advised by the relevant service provider.

### Reinstatement

Any existing roads, footpaths and park spaces that are opened to facilitate electricity, gas and telecommunications connections will be reinstated. No further reinstatement will be required regarding services / utility. Residual impacts on services and utilities are considered to be **imperceptible**.

### Difficulties Encountered

There were no difficulties encountered when undertaking this assessment.

## 2.18 Cultural Heritage (Archaeological & Architectural) (Chapter 17)

### Introduction

Plot 1 comprises a greenfield site in the north, while the lands to the south are under development. Plot 2 comprises the existing St. Mochta's playing pitches. The assessment was based on the combination of a desk study, geophysical survey, and archaeological testing within the application area.

### Baseline Environment

#### Proposed Development – Plot 1 (Luttrellstown Gate Phase 2)

There are no recorded monuments, protected structures or National Inventory of Architectural Heritage (NIAH) sites within Plot 1. Geophysical survey (Licence 23R0523) followed by targeted archaeological testing (Licence 25E0117) identified two Archaeological Areas (AAs) within Plot 1. AA1 and AA2 comprise relatively shallow deposits of stoney, charcoal stained soil indicating the presence of burnt mounds or *fulachtaí fia*. Both are located in areas designated for proposed residential development.

Geophysical survey (Licence 23R0523), testing (Licence 24E0045), and full excavation (Licence 24E0565) have fully resolved the medieval settlement located in the south-western portion of Plot 1.

### **Proposed Development – Plot 2 (St. Mochta’s LRD)**

There are no recorded monuments, protected structures or NIAH sites within Plot 2. While Plot 2 has been the subject of geophysical survey (Licence 23R0523) and archaeological testing (Licence 24E0430), the presence of the existing playing pitches precluded a full assessment of the archaeological potential of these lands. Testing identified that at least parts of this area have been used as a construction site compound and for other construction works, causing considerable disturbance. The development of the playing pitches would also have required a degree of ground disturbance.

### **Potential Impacts**

#### **Proposed Development – Plot 1 (Luttrellstown Gate Phase 2)**

##### **Construction Stage**

The burnt mounds identified in AA1 and AA2 have a medium sensitivity rating and the magnitude of impact would be very high, resulting in a significant, negative, permanent potential impact on the archaeological features.

##### **Operational Stage**

No operational phase impacts were identified for Plot 1. All cultural heritage issues identified will occur during the pre-construction phase or construction phase of the proposed development.

##### **Do-Nothing Impact**

In the ‘do-nothing’ scenario the proposed site would not be redeveloped and therefore there would be no adverse impacts to features of architectural heritage, cultural heritage, or historic interest.

#### **Proposed Development - Plot 2 (St. Mochta’s LRD).**

##### **Construction Stage**

While the previous disturbances will have reduced the potential for the survival of below-ground archaeological remains, the extent of the disturbance remains uncertain. Given the large dimensions of the playing pitches, where archaeological testing could not be carried out to confirm the extent of the previous disturbance, there remains a potential that below-ground archaeological remains could be present. Groundworks associated with the proposed residential development in this area would result in a direct impact of any such remains.

##### **Operational Stage**

No operational phase impacts were identified for Plot 2. All cultural heritage issues identified will occur during the pre-construction phase or construction phase, in advance of the operational phase of the proposed development.

##### **Do-Nothing Impact**

In the ‘do-nothing’ scenario the proposed site would not be redeveloped and therefore there would be no adverse impacts to features of architectural heritage, cultural heritage, or historic interest.

## **Cumulative Impact – Plots 1 and 2**

### **Construction Stage**

All permitted and proposed developments within the study area have been assessed in conjunction with the proposed development. As it is proposed to preserve all archaeological remains by record, no cumulative impacts have been identified upon the archaeological resource. No cumulative impacts have been identified in relation to the cultural heritage resource.

### **Operational Stage**

Not applicable.

### **Mitigation Measures**

#### **Proposed Development– Plot 1 (Luttrellstown Gate Phase 2)**

##### **Construction Stage**

Given the fragile nature of the surviving archaeological deposits, anticipated changes to the water table from construction and its potential negative impact on the remaining archaeological deposits, the two areas of archaeological interest, AA1 and AA2, will be preserved by record, i.e. subject to full archaeological excavation. The full archaeological excavation will be carried out in advance of construction, under licence to the National Monuments Service (NMS) (Department of Housing, Local Government and Heritage (DHLGH)), subject to their approval of a licence application and method statement. Licences can take up to 4 weeks to procure.

##### **Operational Stage**

All cultural heritage issues will be resolved by mitigation during the pre-construction phase or construction phase, in advance of the operational phase. No operational phase impacts were identified for the proposed development.

#### **Proposed Development- Plot 2 (St. Mochta's LRD).**

##### **Construction Stage**

Given the size of the existing playing pitches and the negligible to low potential for the survival of below-ground archaeological remains, Plot 2 will be further assessed prior to construction in form of additional test excavation. This will be carried out under licence to the National Monuments Service (NMS) (Department of Housing, Local Government and Heritage (DHLGH)), subject to their approval of a licence application and method statement. Licences can take up to 4 weeks to procure.

##### **Operational Stage**

All archaeological issues will be resolved by mitigation during the pre-construction phase or construction phase, in advance of the operational phase.

### **Residual Impact**

#### **Proposed Development – Plots 1 and 2**

##### **Construction Stage**

No significant residual impacts were identified for either Plot 1 or Plot 2.

Any archaeological features present that require excavation will thus be permanently removed, in whole or in part from the landscape. However, the archaeological excavation of the sites or parts

thereof that lie within the proposed development, will involve full recording of all archaeological features, finds and deposits. The results of the excavations will add to the body of knowledge, resulting in a slight positive residual impact.

### **Operational Stage**

No residual impacts were identified for operational phase for Plot 1 or Plot 2.

## **2.19 Risk Management (Chapter 18)**

This assessment describes the proposed development in respect of its potential vulnerability to major accidents/ disasters. It also considers the potential for the development to give rise to major accidents/ disasters.

The scope and methodology of this assessment is based on the understanding that the proposed development will be designed, built and operated in line with best international current practice. As such, major accidents resulting from the proposed development would be very unlikely.

A risk analysis-based methodology that covers the identification, likelihood and consequence of major accidents and / or disasters has been used for this assessment. There are no Seveso sites in the vicinity of the site.

No potential scenarios during the construction phase were identified as requiring further assessment.

## **2.20 Summary of Mitigation Measures (Chapter 19)**

This Chapter provides a summary of all the mitigation and monitoring measures proposed throughout the EIAR document for ease of reference for the consent authority and all other interested parties.

## **2.21 Summary of Residual Impacts & Cumulative Impacts (Chapter 20)**

This Chapter provides a summary of all the residual impacts identified throughout the EIAR document for ease of reference for the consent authority and all other interested parties.

## **2.22 Summary of Interactions (Chapter 21)**

This Chapter identifies the principal interactions between the potential impacts of the environmental factors identified in Chapters 5-17 inclusive, and as well as cumulative impacts arising based on best scientific knowledge.

All potential interactions have been addressed as required throughout the EIAR. During each stage of the assessment contributors have liaised with each other (where relevant) to ensure that all such potential interactions have been addressed.